



October 29, 2019

Endangered Species Division
Office of Protected Resources
National Marine Fisheries Service (NMFS)
1315 East West Highway (SSMC3)
Silver Spring, MD 20190

Attn: Humpback Whale Critical Habitat Proposed Rule

To Whom It May Concern:

On behalf of the Petersburg Borough Assembly, I am writing to request that NMFS hold a public hearing in our community as part of its information gathering on the draft proposed rule to designate critical habitat for endangered humpback whales. As you know, NMFS has proposed designating Petersburg and other Southeast Alaska-area waters as critical habitat for the Mexico Distinct Population Segment (DPS) of the species.

Petersburg is a commercial fisheries-dependent coastal community in Southeast Alaska. Our waters are rich in salmon, halibut, crab, sablefish, sea urchins, and other species that support our commercial fisheries. NMFS's own statistics indicate that in 2017, nearly 65 million pounds of seafood were landed in Petersburg, with an ex-vessel value of \$52 million. In terms of total economic value to the community, the latter figure is multiplied several times when factoring in processing employment and income; bait, food, and fuel purchases; seafood sales, transportation and export; vessel services; and raw fish tax collected by the Borough which in turn funds many local government services.

The rule notes entanglement in Dungeness crab gear and gillnets threatens humpback whale populations. Dungeness crab is an important fishery to Petersburg. Of the 279 Dungeness crab permit holders listed for Southeast Alaska, 36 percent reside in Petersburg, the highest percentage among all communities in the region, elsewhere in Alaska and other states in the U.S. Drift gillnets are a heavily relied upon gear type for salmon fishing, with 478 permits granted for Southeast Alaska waters. Many of these permittees also reside in Petersburg.

When scheduling hearings on this rule in Alaska, it is important that you do not default just to the largest communities. The hearings should be held in the communities where the fisheries take place and the implementation of the rule will

occur. Petersburg more than fits those requirements. We are also conveniently located close to other Southeast communities affected by the proposed critical habitat designation and whose constituents can travel to Petersburg to attend the hearing without too much effort. The Borough can make available to NMFS public meeting space that is handicapped-accessible with adequate room for attendees and a good sound system.

Thank you for considering this request and we look forward to your reply.

Sincerely,



Mark Jensen
Mayor

Cc: The Honorable Lisa Murkowski
The Honorable Dan Sullivan
The Honorable Don Young
The Honorable Bert Stedman
The Honorable Jonathan Kreiss-Tomkins

Borough Administration

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